

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

**JASON DAVIS and
JENNIFER DAVIS,**

Plaintiffs

v.

CHARMAINE McGUFFEY, et. al.

Defendants,

: Case No. 1:24-cv:0202

: Judge: Barrett

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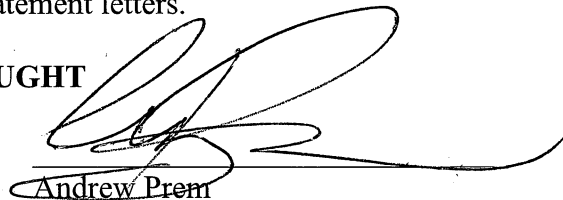
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THE DECLARATION OF ANDREW PREM

My name is Andrew Prem, and I declare the following with personal knowledge, under oath, and with the penalty of perjury.

1. I am trial Counsel for the Defendants in this Action.
2. In this case, we have conducted written discovery about Jason Davis's mitigation efforts.
3. For example, we served a subpoena on Springdale Police Department to obtain Jason Davis's current financial information.
4. This occurred months ago, and Plaintiffs' Counsel were aware of this subpoena, and we produced the records from Springdale to them.
5. Regarding the reinstatement letters, Plaintiffs' Counsel has already conducted discovery on those matters.
6. Zach Gottesman asked some questions about the reinstatement letters when he deposed Chief Kettelman.
7. In addition, Plaintiffs scheduled a separate day to depose the 30(b)(6) representative, Pete Stackpole, about the reinstatement letters.
8. Chris Weist conducted that deposition, and it lasted for about ninety minutes.
9. There were several questions that were objected to because they sought privileged information.
10. Other questions were answered, and Plaintiffs were able to thoroughly depose the County representative about the reinstatement letters.

FURTHER THE DECLARANT SAYETH NAUGHT


Andrew Prem